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6 Attorneys for Plaintiff, CSAA INSURANCE EXCHANGE

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 CSAA INSURANCE EXCHANGE as
subrogee of Dennis and Mona Verducci

12 Plaintiffs,

13 vs.

14 LG ELECTRONICS U.S.A., Inc.; BEST
15 BUY CO., INC. WHICH WILL DO
BUSINESS IN CALIFORNIA AS MN
16 BEST BUY CO., INC.; and DOES 1
through 25, inclusive,

17 Defendants.
18

CASE No.: 15-cv-02899-DMR
HONORABLE DISTRICT JUDGE DONNA M. RYU
COURTROOM 4

**STIPULATION TO CONTINUE ADR
DEADLINE TO JULY 15, 2016 AND ORDER**

TRIAL DATE: 12/05/2016

19 **TO THIS HONORABLE COURT:**

20 The undersigned attorneys for all parties agree and stipulate to request a 90-day
21 continuance of the current mid-April, 2016, alternative dispute resolution ("ADR")
22 deadline to a new ADR deadline of **July 15, 2016**. This request is made to allow new
23 counsel for plaintiff time to get up to speed / conduct discovery prior to mediation.

24 DATE: February 1, 2016

MUSICK, PEELER & GARRETT LLP

25 *(see attached email)*

26 William A. Bossen,

27 Cameron W. Thomas

28 Attorneys for Defendant LG Electronics USA

STIPULATION TO CONTINUE ADR DEADLINE TO JULY 15, 2016

1 DATE: February 1, 2016

MANNING & KASS ELLROD, RAMIREZ,
TRESTER LLP

2
3
4 *Melissa L. Grant*
Melissa L. Grant

Attorneys for Defendant BEST BUY CO, INC.

5
6 DATE: February 1, 2016

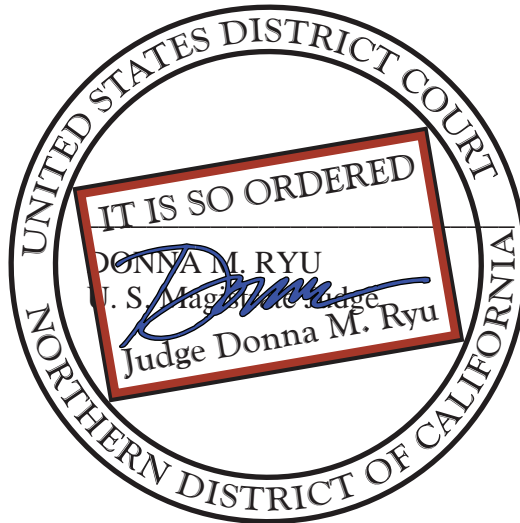
JANG & ASSOCIATES, LLP

7
8 *Jennifer A. Stewart*
Jennifer A. Stewart,

Attorneys for Plaintiff, CSAA INSURANCE
EXCHANGE

9
10
11 IT IS SO ORDERED.

12
13 Dated: February 2, 2016



Mairin MacDonald

From: Bossen, William <W.Bossen@MPGLAW.com>
Sent: Monday, February 01, 2016 1:17 PM
To: Jennifer Stewart; Melissa Grant (mlg@manningllp.com); Thomas, Cameron
Cc: Mairin MacDonald; Alan Jang
Subject: RE: CSAA v. Best Buy (Verducci)

LG will stipulate.

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From: Jennifer Stewart [<mailto:jstewart@janglit.com>]
Sent: Monday, February 01, 2016 12:46 PM
To: Melissa Grant (mlg@manningllp.com); Thomas, Cameron; Bossen, William
Cc: Mairin MacDonald; Alan Jang
Subject: CSAA v. Best Buy (Verducci)

Dear Counsel:

Ivy from Judge Ryu's courtroom is now telling me that if the only reason I want to keep the 2/3/16 CMC on calendar is to continue the April ADR deadline, I should file a stipulation of all counsel re continuing the deadline instead, so as not to waste everyone's time. Fair enough. Will you both stipulate to continuing the April ADR deadline to July 15, 2016? I'll prepare the stip and circulate for filing today. If you'd prefer some other ADR deadline, please let me know asap.

Thanks!

Jennifer A. Stewart
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PROOF OF SERVICE

I, Mairin MacDonald, declare:

I am employed in Contra Costa County, State of California, am over the age of eighteen years, and not a party to the within action. My business address is 1766 Lacassie Avenue, Suite 200, Walnut Creek, California 94596. I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service and/or other overnight delivery. Under overnight delivery practice, all mailings are deposited in an authorized area for pick-up by an authorized express service courier the same day it is collected and processed in the ordinary course of business.

On this date, I served a true copy of the document described as:

• **STIPULATION TO CONTINUE ADR DEADLINE TO JULY 15, 2016**

on the parties in this action by placing a true copy thereof in a sealed envelope, and each envelope addressed as follows:

David V. Roth, Esq.
Melissa L. Grant, Esq.
MANNING & CASS
ELLROD, RAMIREZ, TRESTER, LLP
121 Spear Street, Suite 200
San Francisco, CA 94105

William A. Bossen, Esq.
MUSICK, PEELER & GARRETT, LLP
1 Wilshire Blvd., Suite 2000
Los Angeles, CA 90017

✓ **By U.S. Mail:** I caused each such envelope to be served by depositing same, with postage thereon fully prepaid, in the United States Postal Service in the ordinary course of business at Walnut Creek, California.

By CM/ECF Notice of Electronic Filing; I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/EDF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 1, 2016, at Walnut Creek, California.


Mairin MacDonald